

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

JEANETTA B. PIRTLE;
HUMBERTO MEDINA-TORRES

Plaintiffs

v.

MUNICIPALITY OF ISABELA.;
INSTITUTION A; JOHN DOE, RICHARD
ROE; INSURANCE COMPANIES 1, 2, & 3

Defendants

* CIVIL NO. 18-1200 (JAG-BJM)

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PLAINTIFFS DEMAND
TRIAL BY JURY

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**FIRST SET OF INTERROGATORIES AND REQUEST FOR PRODUCTION OF
DOCUMENTS DIRECTED TO DEFENDANT MUNICIPALITY OF ISABELA**

Plaintiffs propound their First Set of Interrogatories to the Co-defendant, the Municipality of Isabela, and demand that the Co-defendant answers, under oath, in writing, within thirty (30) days from receipt hereof so as to furnish Plaintiffs with all responsive information available to Co-defendant, its agents, attorneys or any other persons acting on their behalf, in accordance with Rule 33 of the Federal Rules of Civil Procedure.

1. State your full name, any other names by which you have been known during your life, social security number, driver's license number, address at the present time, and under whose authority you answer this First Set of Interrogatories and Production of Documents.

2. State the education, special training, occupational training, and/or work experience you had at the present, and, if you were licensed by any governmental agency or authority to

practice or engage in any profession or occupation at the present, describe the license and identify the issuing authority.

3. State the date on which you started to work for the Municipality of Isabela, your starting title and/or position and your present title and/or position at the company, and the name(s) of your supervisor(s) at each position.

4. State the name and address of your previous employers for the five (5) years prior to the present, stating your position or title with each employer, and the name of your supervisor at each position.

5. State the name and address of your current employer and the name of your current supervisor.

6. State the name, last known address and present whereabouts of each and every person now known to you, your attorneys, investigators, agents, or other representatives, who has or claims to have knowledge of any facts or evidence relevant to any of the issues involved in this action, including but not limited to:

- a. the manner of the occurrence of the accident;
- b. the cause of the accident;
- c. any relevant conduct, or omission of, or statement made by, any person involved in the accident or in any way connected therewith;
- d. the injuries and damages sustained by the plaintiff by reason of the accident.

7. State the name and address of each and every person of whom you have knowledge who claims to have witnessed the alleged accident.

8. State the name and address of each and every person known to you who witnessed the alleged accident.

9. Did you obtain any statements, notes, memoranda or writings of any kind from any person which in any way relate to the alleged accident? If so, identify each and every such document by date, subject matter and name of person furnishing same or signing same.

10. Specify, enumerating in detail all the documentary evidence you intend to produce at the trial of the instant case.

11. Give the name and address of each and every witness you intend to use at the trial of the instant case.

12. State if any person acting on your behalf or on behalf of your attorneys has conducted any investigation regarding the facts set forth in the complaint or in any way related to the complaint.

13. If your answer to the above is in the affirmative, state:

- a. name of person(s) who conducted the investigation(s);
- b. person(s) who was (were) contacted during said investigation(s);
- c. name(s) and address(s) of person(s) from who statement(s) was (were) obtained; either written or oral;
- d. enclose with your answer to these interrogatories a copy of said statement(s), or if not transcribed, a summary of same.

14. Were any photographs or motion pictures taken of the accident scene or of any object or person involved in the accident? If so, please state:

- a. what is depicted by each photograph and/or motion picture;
- b. the date on which each film was taken;
- c. the name and address of the photographer;

- d. the name and address of the person who now has custody of the photographs or pictures.

15. By way of a Request for Production please furnish a copy of each still photograph and motion picture referred to in your answer to interrogatory number fourteen (14) above.

16. Since the time of the accident have you or your attorney had prepared any drawings, plats or diagrams of the scene of the accident, or any object involved in the accident? If so, please state:

- a. what is depicted in each drawing plat or diagram?
- b. when each item was prepared;
- c. the name and address of the person who prepared each item;
- d. the name and address of the person who now has custody of each item.

17. By way of a Request for Production, please furnish a copy of each drawing, plat or diagram referred to in your answer to interrogatory number sixteen (16).

18. Were any tests, inspections or measurements made or taken with respect to the accident scene or any object involved in the accident? If so, please state:

- a. the subject of each test, inspection or measurement;
- b. the name and address of the person who conducted each test, inspection or measurement;
- c. the date on which each test, inspection or measurement was performed;
- d. the name and address of the person now having custody of any written report concerning each test, inspection or measurement.

19. By way of Request for Production, please furnish a copy of each written test report referred to in your answer to interrogatory number eighteen (18).

20. With respect to all witnesses whom you will or may call as experts to give opinion testimony in the trial of this matter, state the following:

- a. name and address;
- b. name and address of his employer or the organization with which he is associated in any professional capacity;
- c. the field in which he is to be offered as an expert;
- d. a summary of his qualifications within the field in which he is expected to testify;
- e. the substance of the facts to which he is expected to testify;
- f. the substance of the opinions to which he is expected to testify and a summary of the grounds for each opinion; and
- g. the dates of all reports rendered by such experts for whom prepared and in whose custody at present.

21. State each and every fact which you may contend constituted negligent conduct on the part of the plaintiff(s) which contributed to the occurrence of the accident.

22. Submit any and all documents related in any way to any of the previous questions and all those related in any way to the facts surrounding this case, whether or not you intend to present them at trial.

23. State the name and address of each and every primary and excess insurer of the Municipality of San Juan that may have issued a policy of liability insurance affording coverage for the accident and damages alleged in the complaint, and attach a certified true and exact copy of any such policies, including all jackets, forms and endorsements.

24. State the name and address of each and every independent contractor and/or company and/or government agency that may have been effectuating work in the area and time frame in which the accident alleged in the complaint occurred.

25. State who had the duty maintain the area where the plaintiff Ms. Jeanetta B. Pirtle allegedly slipped and fell in the alleyway use to reach Poza Azul Beach in the Municipality of Isabela.

CERTIFICATE OF SERVICE: That on this same date an exact copy of this document was sent by email to the attorneys of record.

In San Juan, Puerto Rico, this 25nd day of November 2019.

/s/ David Fernández-Esteves
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